

ROBERT WISNIEWSKI P.C.  
ATTORNEYS-AT-LAW

17 STATE STREET, SUITE 820 • NEW YORK, NY 10004  
TEL: (212) 267-2101 • WEB: www.rwapc.com

# MEMO ENDORSED

October 10, 2023

Hon. Barbara C. Moses, U.S.M.J.  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007  
*VIA ECF*

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 10/11/2023
---

**Re: Leitch et al. v. Amazon Services Com LLC**  
**SDNY Docket No.: 22-cv-06121- BCM**

Dear Judge Moses,

I represent Plaintiffs in this matter. For the reasons that follow, this is a joint request for an extension of time for the parties to file a letter respecting continued discovery disputes (the “Letter”) from today to Monday, October 16, 2023. All previous requests applications have been granted. There is no prejudice to any party.

We report that late last week Plaintiffs’ expert and Defendants’ employee knowledgeable with Amazon’s time keeping system did have a discussion which helped Plaintiffs’ expert better understand the data that Plaintiffs received as well as the data that still needs to be produced. I subsequently had a conference with Plaintiffs’ expert regarding same and, today, I transmitted to counsel for Amazon Plaintiffs’ proposal as to what electronic and other data Plaintiffs need. We agreed to hold a meet and confer session with a view to resolving or substantially limiting the discovery dispute and, hopefully, withdrawing Plaintiffs’ motion to compel. We just need a few more days to hold the meet and confer session. Counsel for both parties are optimistic that this is the final request for an extension of time regarding the pending motion.

Wherefore, the parties respectfully request that Your Honor permit them to file the Letter by Monday, October 16, 2023.

Respectfully submitted,

/s/ Robert Wisniewski  
Robert Wisniewski

cc: All counsel of record via ECF

Application GRANTED. SO ORDERED.



Barbara Moses  
United States Magistrate Judge  
October 11, 2023